

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE:	)	
	)	
JAMES LEWIS TODD, Jr.	)	CASE NO. 14-09379-RLM-7A
	)	
	)	
Debtor.	)	

**AGREED ENTRY RESOLVING TRUSTEE'S OMNIBUS OBJECTION TO  
PROOF OF CLAIM #1 AND CLAIMANT'S RESPONSE**

Deborah J. Caruso, as Trustee (the "Trustee"), and Holwager, Byers and Caughey (the "Claimant"), by counsel, David L. Byers, for their *Agreed Entry Resolving Trustee's Omnibus Objection to Proof of Claim #1 and Claimant's Response* (this "Agreed Entry"), states as follows:

1. On October 9, 2014 (the "Petition Date"), James Lewis Todd, Jr. (the "Debtor") filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code (the "Bankruptcy Code"), in the Southern District of Indiana, Indianapolis Division (this "Court"), initiating the above-referenced bankruptcy case (the "Bankruptcy Case").

2. At times relevant herein, the Trustee has been the duly appointed, qualified and acting Chapter 7 Trustee of the bankruptcy estate (the "Bankruptcy Estate").

3. On December 11, 2014, the Trustee filed her *Trustee's Report of Possible Assets and Notice of Abandonment*. On December 12, 2014, the Court issued the *Notice of Possible Assets with Abandonment* setting the proofs of claim bar date, March 16, 2016 (the "Claims Bar Date").

4. On December 17, 2014, the Claimant, by counsel, filed Proof of Claim #1 (the "Claim") in the amount of \$2,205.00 for attorney fees. Supporting documentation for the Claim was not provided.

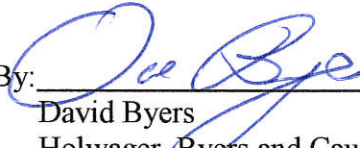
5. On January 4, 2016, the Trustee filed her *First Omnibus Objection to Claims* (the "Objection") objecting to the Claim on the grounds no supporting documentation was provided with the Claim. The Trustee requested the Court disallow the claim in its entirety.

6. On January 18, 2016, the Claimant, by counsel, filed a response to the Trustee's Objection (the "Response"). Included with the Response was supporting documentation. The Trustee has reviewed the supporting documentation and determined that all criteria have been met to allow the Claim in its entirety as a general unsecured claim.

WHEREFORE, the Trustee and the Claimant respectfully request that the Court approve the Agreed Entry allowing Claim #1 in its entirety as a general unsecured clam and grant all other just and proper relief.

Respectfully Submitted,

By: /s/ Deborah J. Caruso  
Deborah J. Caruso, Trustee  
135 N. Pennsylvania St, Suite 1400  
Indianapolis, IN 46204  
Tel: (317) 634-0300  
Email: trustee caruso@rubin-levin.net

By:   
David Byers  
Holwager, Byers and Caughey  
1818 Main St  
Beech Grove, IN 46107  
Tel: (317) 787-8359  
Email: dbyers@hbclegal.com  
Attorney for the Holwager, Byers and Caughey

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2016, a copy of the foregoing *Agreed Entry Resolving Trustee's Omnibus Objection to Proof of Claim #1 and Claimant's Response* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

David L. Byers dbyers@hbclegal.com, emize@hbclegal.com

John J. Petr jjp@kgrlaw.com, kmw@kgrlaw.com

U.S. Trustee ustpreion10.in.ecf@usdoj.gov

Mark S. Zuckerberg Crystal@waltonlegal.net, DarleneR@waltonlegal.net

I further certify that on February 23, 2016, a copy of the foregoing *Agreed Entry Resolving Trustee's Omnibus Objection to Proof of Claim #1 and Claimant's Response* was mailed by first-class U.S. Mail, postage prepaid, and properly addressed to the following:

None

/s/ Deborah J. Caruso  
Deborah J. Caruso, Trustee